

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICHOLAS MARTIN on behalf of himself)
and others similarly situated,)
)
Plaintiff,)
) Case No. 1:13-cv-6923
vs.)
) Hon. Manish S. Shah
JTH TAX, INC., d/b/a LIBERTY TAX)
SERVICE,)
)
Defendant.)

**PLAINTIFF'S MOTION TO EXTEND TIME TO FILE MOTION FOR PRELIMINARY
APPROVAL OF CLASS SETTLEMENT**

Plaintiff Nicholas Martin respectfully requests that that this Court extend the time within which he may file a motion for preliminary approval of class action until January 23, 2015. In support of this motion, plaintiff states:

1. On November 17, 2014, this Court directed Plaintiff to file his Motion for Preliminary Approval of Class Settlement by December 12, 2014 (Dkt. No. 50). At this Court's status hearing on November 17, 2014, that was acknowledged to be an ambitious deadline for the filing of such a motion. Pursuant to a request by the parties, on December 15, 2014, this Court extended that deadline to January 9, 2015.
2. The parties have been diligently working on settlement papers, and are very close to finalizing them. However, the settlement is not yet ready for submission to the Court for consideration. Plaintiff therefore requests that the Court permit the parties two more weeks, until January 23, 2015, to submit their motion for preliminary approval.
3. Plaintiff further requests that the preliminary approval hearing currently set for

January 13, 2015 (Dkt. No. 50) be reset to January 28, 2015.

4. Counsel for Plaintiff has conferred with counsel for Defendant, who has confirmed that Defendant agrees to the relief requested herein. Further, this extension will not interfere with any other matters scheduled in this case.

WHEREFORE, respectfully requests that that this Court extend the time within which he may file a motion for preliminary approval of class action until January 23, 2015.

Dated: January 9, 2015

Respectfully submitted,

/s/ Alexander H. Burke

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CERTIFICATE OF SERVICE

I, Alexander H. Burke, an attorney, do hereby certify that on December 12, 2014, I electronically filed the foregoing Agreed Motion to Extend Time to File Motion for Preliminary Approval of Class Settlement with the Clerk of the Court using the CM/ECF system, which caused the same to be served on the following counsel of record via ECF filing:

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